

**THE LAW FIRM OF HUGH H. MO,**

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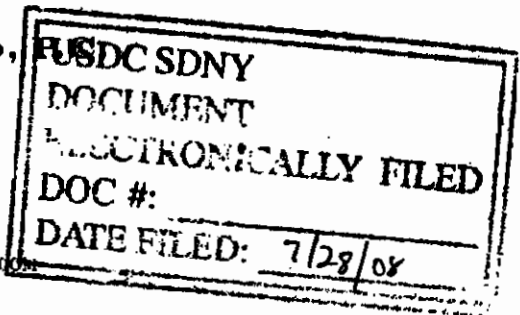
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July 25, 2008



Via Facsimile (212) 805-7906

Hon. Denny Chin, U.S.D.J.  
U.S. District Court – S.D.N.Y.  
500 Pearl Street, Room 1020  
New York, New York 10007

RE: *Jin M. Cao, et al. v. Wu Liang Ye Lexington Restaurant, Inc., et al.*  
USDC-SDNY  
08 CIV. 3725 (DC) (HP)

Dear Judge Chin:

We are the attorneys for defendant Liang Zhang in the above-referenced action. We just received this afternoon by fax plaintiff's counsel's response to our July 17, 2008 letter requesting another pre-motion conference to address the issues that would be raised in our anticipated, early motion for summary judgment.

Plaintiffs' response is merely an obfuscation of the facts in an attempt to dissuade this Court from considering defendant's application to dismiss plaintiff's action against Mr. Zhang, which would be appropriate under the circumstances. As we indicated in our request, none of plaintiffs' documents (nor defendant's documents) raise a genuine issue of material fact as to Mr. Zhang's liability herein. Rather, plaintiffs have failed to produce "corporate documents" that justify their lawsuit against Mr. Zhang or continuing this frivolous litigation against Mr. Zhang.

Therefore, we respectfully request that this Court schedule another pre-motion conference to discuss the issues raised herein over plaintiffs' counsel's objections.

Thank you for your consideration.

Respectfully,

Hugh H. Mo

cc:

Jane H. Yoon, Esq.  
Ken Kimerling, Esq.

Defendant Zhang's request for a pre-motion conference is denied, as no conference is necessary. If Mr. Zhang wishes to move for summary judgment, he may do so without another pre-motion conference. SO ORDERED. 7/28/08  
WDS